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EXHIBIT A
(Proposed Order)

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Attorneys for the Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER FURTHER
EXTENDING DEADLINE FOR THE
REORGANIZED DEBTORS TO OBJECT
TO CLAIMS AND FOR RELATED
RELIEF**

Date: November 5, 2024
Time: 10:00 a.m. (Pacific Time)
Place: **(Telephonic or Video Only)**
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Upon the Motion, dated October 15, 2024, (the “**Motion**”)¹ of PG&E Corporation and Pacific
2 Gas and Electric Company, as debtors and reorganized debtors (together, the “**Debtors**” or the
3 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), in
4 accordance with Section 7.1 of the Plan, sections 105(a) and 1142 of title 11 of the United States
5 Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure
6 (the “**Bankruptcy Rules**”), for entry of an order extending the deadline for the Reorganized Debtors
7 to object to claims by an additional one hundred eighty (180) days, through and including
8 June 16, 2025, without prejudice to the Reorganized Debtors’ right to seek additional extensions
9 thereof; and consideration of the Motion and the requested relief being a core proceeding pursuant
10 to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and
11 1409; and the Court having found and determined that notice of the Motion as provided to the parties
12 listed therein is reasonable and sufficient, and it appearing that no other or further notice need be
13 provided; and this Court having reviewed the Motion and the McWilliams Declaration submitted in
14 support thereof; and this Court having determined that the legal and factual bases set forth in the
15 Motion establish just cause for the relief granted herein; and it appearing that the relief requested in
16 the Motion is in the best interests of the Debtors, their estates, creditors, shareholders, and all parties
17 in interest; and upon all of the proceedings had before this Court and after due deliberation and
18 sufficient cause appearing therefor,

19 **IT IS HEREBY ORDERED THAT:**

- 20 1. The Motion is granted as provided herein.
- 21 2. The deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the
22 Plan (as approved by Paragraph 31 of the Confirmation Order) is further extended by one hundred
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25 ¹ Capitalized terms used but not herein defined have the meanings ascribed to such terms in the Motion,
26 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19,*
27 *2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together with any
28 exhibits or schedules thereto, the “**Plan**”), or the *Order Confirming Debtors’ and Shareholder*
Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket No. 8053] (the
“**Confirmation Order**”), as applicable.

1 eighty (180) days, through and including June 16, 2025, without prejudice to the right of the
2 Reorganized Debtors to seek additional extensions thereof.

3 3. Consistent with the Plan and the Confirmation Order, the Debtors and Reorganized
4 Debtors shall have no obligation to object to Fire Victim Claims or Subrogation Wildfire Claims, nor
5 shall any such non-objection constitute an allowance or deemed allowance of any Fire Victim Claim
6 or Subrogation Wildfire Claim. Pursuant to the Plan and the Confirmation Order, all Fire Victim
7 Claims and Subrogation Wildfire Claims have been channeled to the Fire Victim Trust or the
8 Subrogation Wildfire Trust, as applicable, and shall be resolved by the applicable Fire Victim Trust
9 or Subrogation Wildfire Trust, in each case, without any recourse to or Claims whatsoever against
10 the Debtors or Reorganized Debtors or their assets and properties.

11 4. For the avoidance of doubt, the relief granted herein does not apply to the existing
12 deadline for the Reorganized Debtors to object to the United States Claims.

13 5. This Court shall retain jurisdiction to hear and determine all matters arising from or
14 related to the implementation, interpretation, or enforcement of this Order.

15 ** END OF ORDER **
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